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International Tire & Rubber Association, Inc.

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February 14, 2001

Docket Management Section
National Highway Traffic Safety Administration
US Department of Transportation
400 7th St. SW, Room PL-401
Washington, DC 20590

RE: Docket #NHTSA-00-8296 -18
Request for Comments on Advanced Notice of Proposed Rulemaking on
Tire Sidewall Labeling Requirements

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INTRODUCTION

The International Tire & Rubber Association (ITRA) Inc. is a not for profit organization that provides technical assistance and training for the tire and transportation industry. ITRA represents over 1,800 member companies in North America and 54 other countries. Most of these companies are involved in the manufacture, sale and service of tires and wheels, or retreading, repairing and recycling of tires used in the transportation industry. The majority of these companies are located in North America and employ over 600,000 workers.

The ITRA is interested in any efforts to enhance the safety of the general motoring public. In fact, our extensive training programs, in the field and at the ITRA Headquarters and Training Center, emphasize safety for the motoring public by encouraging safer workplace environments in the tire and transportation industry.

We appreciate the opportunity to submit comments on the Proposed Rulemaking on Tire Sidewall Labeling Requirements.

TIRE SIDEWALL LABELING REQUIREMENTS FOR RETREADED TIRES

Our first comment concerns Question 24 in the Federal Register Volume 65 #232 December 01, 2000: "What changes, if any, should be made in the labeling requirements applicable to retreaded tires?" Since the recent changes that mandate a four digit Date Code in place of the previous three digit Date Code, we believe the existing labeling requirements work very well and are sufficient for future needs. We find that retreaders, tire dealers and consumers understand the existing labeling requirements and do not need additional information on the sidewalls of retreaded tires.

TIRE SIDEWALL LABELING REQUIREMENTS FOR NEW PASSENGER AND LIGHT TRUCK TIRES

ITRA has thoroughly reviewed the comments submitted on this issue by the Rubber Manufacturers Association (RMA), response dated January 30, 2001. With the exception of items 13, 14, 16, 18, and 26, ITRA fully supports RMA's position on all other sections.

Regarding Item 13, "Maximum Load Rating Versus Load Index," ITRA does not oppose the addition of a load index symbol. However, we do oppose removing the existing maximum inflation pressure in psi and load carrying capacity in pounds at a specific psi. We are concerned that the consumer or the tire technician may attempt to inflate a tire without clearly understanding the meaning of the load index symbol. The maximum inflation pressure in psi helps to avoid unintentional overinflation of tires, and the maximum load in pounds serves as a guide on vehicle load capacity.

European countries have been using the load index in place of the maximum inflation pressure and load for many years, and we think the additional decibel is a good idea. However, we strongly believe it would be a mistake to remove the maximum inflation pressure and load carrying capacity as it exists on tires today.

Item 14, "Consumer Understanding/Use of Load Index," mentions that when purchasing replacement tires, consumers should be careful to purchase the proper size tire and load carrying capacity. In many cases with light truck operations, the consumer may not be able to determine the proper load carrying capacity; many light trucks are fitted with special equipment that may require different or heavier tires on the rear of the vehicle than on the front. In this case, using the placard on the vehicle or the owner's manual could cause underrated tires to be applied to the vehicle.

Often with light trucks, it is necessary to weigh the individual axles before determining the proper tires for the vehicle. At times, the rear axle may require heavier tires than the front axle.

Regarding Item 16, "Determination of Inflation/Load Capability," we disagree that consumers do not use the load rating information in pounds as posted on the tire sidewalls. We find that a considerable number of consumers, as well as service personnel, use the markings on tire sidewalls as a reference if they do not understand the symbol meaning or have a chart available, such as at an airing station or a service station.

In some cases, consumers accustomed to bias tires inflate radial tires until the natural sidewall bulge of a radial tire disappears. This can be extremely dangerous and cause a tire to rupture and result in serious injuries. We believe the existing maximum inflation pressure markings are less confusing to the consumer and make them more conscious of the hazards of overinflation.

It also creates a hazard when tires have identical size markings except one is a P-metric tire while the other is an "LT" for light truck. Although the size designations are the same, one may have a maximum inflation pressure of 40 psi, while the other has a maximum inflation as high as 90 psi. In this situation, the consumer may become confused with the load index rather than the maximum inflation pressure and

National Highway Traffic Safety Administration
February 14, 2001
page 3

overinflate the P-metric tire. With some brands, the P-metric and LT tires also have identical tread designs making it very difficult to distinguish between the two tires.

We clearly understand that the maximum inflation pressure marked on today's tires is normally higher than the recommended pressure. However, in most cases, it is not high enough to create major problems, and it presents less risk than if the markings are removed from the tire and replaced with a load symbol that some people may not understand.

Regarding Item 18, "Number of Plies and Cord Material Plus Related Information (mileage warranty)," ITRA believes the number of plies in the tire, the type of cord material used in the plies and the placement of the plies are extremely important to the tire retread, repair and recycling industries. When tires are processed for retreading or repairing, it is extremely important for the retreader or repair technician to understand the make-up of the tires and the types of plies. This enables them to select the proper repair materials or procedures for retreading or repairing the tires. There are also indications that recyclers who grind and process tires into other recycled products need to know the types of fabric, steel and other components in the tires as new technologies are developed.

Additionally, a steel cord radial tire can experience a circumferential or "zipper" rupture in the upper sidewall when it is operated underinflated or overloaded. If information regarding the number of plies and cord material is removed from the sidewall, technicians cannot determine if the tire has a steel cord sidewall ply. As a result, many light truck tires will be inflated outside a restraining device or safety cage where they represent a substantial threat to the technician. This information is critical when determining if the tire is a candidate for a zipper rupture.

Finally, Item 26 addresses "Removal of Sidewall Maximum Inflation Value." I covered most of ITRA's concerns about these issues in my previous comments in this letter, but I want to reemphasize that ITRA believes it is a mistake to remove the maximum inflation value that is now molded on the side of the tire in pounds per square inch. Again, while we do not disapprove of the use of a load symbol on the tire, we think it is important that the maximum tire inflation pressure remain molded on the sidewall in the same area where it is today. The location of this marking near the rim flange helps to protect the lettering as scrubbing of the mid sidewall of a tire against a curb will, in many cases, cause information in the flex area to be obliterated and made unreadable.

Once again, ITRA appreciates the opportunity to respond to these important tire identification and record keeping issues. If you have any questions or concerns, please call me.

Sincerely,

A handwritten signature in cursive script, reading "Marvin Bozarth".

Marvin Bozarth
Executive Director